

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Proposed National Thousands-Block	)	Docket 99-200
Number Pooling Roll-out Schedule	)	

**REPLY COMMENTS OF  
VOICESTREAM WIRELESS CORPORATION**

VOICESTREAM WIRELESS CORPORATION

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November 16, 2001

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**I. INTRODUCTION**

VoiceStream Wireless Corporation (“VoiceStream”) hereby files reply comments in the above proceeding involving the proposed national thousands-block number pooling rollout schedule.

**II. DISCUSSION**

**A. The proposed schedule omits integration of the wireless industry and is inconsistent with the requirements of the Numbering Resource Optimization (“NRO”) Order.**

VoiceStream reiterates its concerns for the proposed schedule for the national rollout of thousands-block number pooling as provided in the Public Notice dated October 17, 2001. VoiceStream, along with the majority of commenting carriers, have detailed that the proposed rollout schedule is inconsistent with the Federal Communication Commission’s (“Commission”) requirements from the NRO Order. These deviations will likely impact network stability and place an insurmountable drain on the previously planned allocation of carrier resources.

In our comments, VoiceStream specifically noted the following: (1) *the absence of a pooling establishment catch up plan for carriers who become Local Number*

*Portability (“LNP”)-capable after the NPA’s Pool Start Date* and (2) the direct contradiction of the Commission’s requirement that the number of NPAs pooled not exceed 21 per quarter in order to ensure network reliability.<sup>1</sup> Importantly, a significant number of other commenting carriers also highlighted these same concerns.<sup>2</sup> VoiceStream believes that this significant deviation from the NRO requirements yields unreasonable demands on limited resources that will result in adverse impacts on the carriers’ and the Pooling Administrator’s work force and systems. This belief is reinforced by the “real life” comments of carriers that have already deployed this optimization measure and understand the inherent network, carrier and Pooling Administrator limitations.<sup>3</sup> Thus, VoiceStream remains apprehensive about the fact that there has been a lack of coordinated planning to address the high pooling volumes projected by CMRS carriers for the 2002 holiday sales season.

For the foregoing reasons, VoiceStream renews its request that consideration be given to procedures that accommodate pooling establishment “catch-up” for members of the wireless industry operating in NPAs with Pool Start Dates before November 24, 2002 -- while underscoring the fundamental need for the employment of a “deliberate, thoughtful and achievable” schedule that addresses all carrier, Pooling Administrator and state commission concerns and constraints.<sup>4</sup> In addition, VoiceStream joins in support of those carriers who have requested the Commission to place a moratorium restricting state requests for “opting in” as an addition to the 21 scheduled implementations. VoiceStream

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<sup>1</sup> See VoiceStream Comments at Page 3 and Page 4.

<sup>2</sup> See Comments of SBC Communications Inc., at Page 2; See Comments of USTA at Page 2; See Comments of Verizon at Page 1; and See Comments of Bell South at Page 2.

<sup>3</sup> See Comments WorldCom at Page 1; See Comments SBC at Page 1; See Comments Bell South at Page 9.

believes that the employment of procedures for pooling establishment “catch-up”, the roll-out of a realistic schedule which considers carrier, state commission and Number Pooling Administrator constraints, and the moratorium restricting “opting in” are all necessary for the successful nationwide deployment of Thousand Block Pooling.

**B. The proposed rollout schedule must follow the Industry Numbering Committee (“INC”) Thousand Block Pooling Administration Guidelines (“Guidelines”)**

VoiceStream agrees with the position that the national rollout plan should follow the INC Thousand Block Pooling Administration Guidelines as a basis for the efficient deployment of this conservation measure.<sup>5</sup> The Guidelines are “well-reasoned, justified, and [have] produced proven results.”<sup>6</sup> The Guidelines allow the Pooling Administrator along with the industry to establish specific pooling establishment milestone dates for each NPA. More importantly, the flexibility that has been incorporated in these Guidelines provides the Pooling Administrator, carriers and state commissions an opportunity to accommodate unique circumstances in a given NPA.

Several carriers noted the “real life” benefits of utilizing the Guidelines based upon their pooling and portability experience in numerous MSAs with varied amounts of LNP-capable carriers, rate centers, switches, thousand blocks that have been contaminated and the extent of the contamination.<sup>7</sup> The majority of these commenting carriers have generally stated that mandating uniform timelines and intervals would be a

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<sup>4</sup> See Comments of SBC Communications Inc., at Page 1; See Comments of Bell South at Page 4; and Comments of USTA at Page 3.

<sup>5</sup> See Comments USTA at Page 4; See Verizon Comments at Page 3; BellSouth at Page 9; and See Comments of Verizon Wireless at Page 2;

<sup>6</sup> See Comments USTA at page 4-5.

<sup>7</sup> See USTA Comments at Page 5; See Verizon at Page 4;

critical error in the deployment of this conservation measure. The same commenting carriers have also recommended logical adjustments in the implementation schedule and cautioned the impracticalities of certain schedule details. Importantly, the various scenarios provided by these experienced carriers highlights the fact that developing milestone dates in the absence of industry input might very well result in an arbitrary, unreasonable, wasteful and duplicative schedule.<sup>8</sup>

In the absence of any additional procedures for the “catch-up” for carriers who become LNP-capable after the NPA’s Pool Start Date, VoiceStream believes that the INC Guidelines and the flexibility therein must be incorporated into this national pooling rollout schedule. For the foregoing reasons, VoiceStream respectfully requests that the Commission national roll-out schedule follow the INC Guidelines so as to afford all parties the necessary and proven flexibility in deploying Thousand Block Pooling.

**C. The Commission should adopt the LNP methodology for pooling cost recovery**

VoiceStream has previously commented in several state pooling cost recovery proceedings that thousands-block pooling benefits all carriers in a given state, therefore all the shared industry costs should be properly allocated among all carriers in that state. Specifically, VoiceStream has requested that states employ a methodology similar to that used to assess non-recurring and recurring costs for LNP. Employment of an LNP methodology uses carrier revenues as a basis of allocating costs and apportions costs to the entire telecommunications industry. Such a methodology is easier to implement and a more equitable process for cost recovery of both national and state trial pooling costs.

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<sup>8</sup> See Comments BellSouth at Page 9; and See Comments Verizon at Page 4

Recently the State of Virginia conducted a proceeding on allocation of shared pooling costs and ordered the employment of a LNPcost methodology for pooling trials.<sup>9</sup> The Virginia Corporate Commission noted that several carriers recommended the use of the LNP methodology, because it allows for existing processes to be utilized; versus the development of new cost methodologies during the relatively short period before national pooling begins in March 2002.<sup>10</sup> In addition, New Hampshire, Michigan and Arizona currently have similar proceedings pending before their state utility commissions which have heard direct testimony and preliminarily concluded that the LNP methodology is the appropriate cost allocation.<sup>11</sup>

Several commenting carriers in the instant proceeding and other Commission proceedings have also requested that the Commission adopt the LNP methodology as the national cost recovery mechanism via this docket.<sup>12</sup> Based on the before-mentioned, VoiceStream respectfully requests that the Commission order recovery of pooling costs based upon the LNP methodology; and direct the adoption of the same methodology by those certain pooling states who have yet to address cost recovery prior to implementing pooling trials.

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<sup>9</sup> See State of Virginia - Corporate Commission Order dated September 7, 2001 (Case PUC-000304).

<sup>10</sup> See Comments of the Michigan Public Service Commission's Chairman Laura Chapelle, Press Release dated September 7, 2001; where this Commission has already acknowledged the short time frame for implementing pooling trials in Michigan.

<sup>11</sup> See New Hampshire Public Utility Commission – Allocation of Shared Pooling Costs for the Number Pooling Trial in the 603 Area Code; See also Arizona Corporate Commission Docket No. T-00000A-01-0076.

<sup>12</sup> See Comments of USTA at Page 5; See Comments of SBC Communications Inc at Page 9; and See Comments of Bell South at 13.

### **III. CONCLUSION**

For the reasons described above, VoiceStream respectfully requests that the Commission consider a “catch up” process for carriers who become LNP-capable after the NPA’s Pool Start Date, adhere to the NRO deployment requirements by using the INC Guidelines, and adopt the LNP methodology for pooling cost recovery.

Respectfully submitted

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